

UNITED STATES DISTRICT COURT OF MASSACHUSETTS
CENTRAL SECTION

MARK PETERSON

Plaintiff,

vs.

MASSACHUSETTS INSTITUTE OF
TECHNOLOGY - LINCOLN
LABORATORY,
and
RESEARCH DEVELOPMENT AND
TECHNICAL EMPLOYEE'S UNION,

Defendants.

Docket No. 04-40148

JOINT MOTION TO EXTEND SCHEDULING ORDER DEADLINES

Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure and Local Rule 16.1(F), Plaintiff Mark Peterson, Defendant Massachusetts Institute of Technology, and Defendant Research Development and Technical Employees Union (collectively, "the Parties"), hereby move to amend the Scheduling Order in the above-captioned matter to permit additional time to conduct fact discovery.

The Parties request that the interim deadlines for fact discovery be extended by 60 days, and that the final deadline for fact discovery be extended by 30 days, as detailed below.

In support of their Motion, the Parties state that they are in mutual agreement concerning the requests contained herein, and further state that none of the Parties will be prejudiced as a result.

WHEREFORE, the Parties respectfully request that the Scheduling Order be amended as follows:

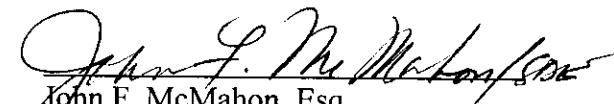
	<u>Current Deadline</u>	<u>Proposed Deadline</u>
<u>Fact Discovery-</u> <u>Interim Deadlines:</u>		
a. All requests for production of documents and interrogatories -	October 3, 2005	December 3, 2005
b. All requests for admission -	January 16, 2006	March 16, 2005
c. All depositions, other than expert depositions -	December 15, 2005	February 15, 2006
<u>Fact Discovery-</u> <u>Final Deadline:</u>		
All discovery, other than expert discovery -	March 1, 2006	April 1, 2006

By their respective counsel,

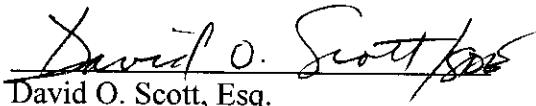
DEFENDANT MASSACHUSETTS
INSTITUTE OF TECHNOLOGY,


Sheryl D. Eisenberg, Esq.
(BBO # 641304)
Sullivan Weinstein & McQuay, P.C.
Two Park Plaza
Boston, Massachusetts 02116
(617) 348-4300

DEFENDANT RESEARCH
DEVELOPMENT AND
TECHNICAL EMPLOYEES
UNION,


John F. McMahon, Esq.
(BBO # 338360)
Angoff, Goldman, Manning,
Wanger & Hynes, P.C.
45 Bromfield Street
Boston, MA 02108
(617) 723-5500

PLAINTIFF MARK A. PETERSON,


David O. Scott, Esq.
(BBO # 449165)
Law Office of David O. Scott, P.C.
200 Chauncy Street
Mansfield, MA 02048
(508) 261-9777

Dated October 31, 2005